

THE UNITED STATES DISTRICT COURT FOR THE
NORTHERN DISTRICT OF OKLAHOMA

W. A. DREW EDMONDSON, in his)
capacity as ATTORNEY GENERAL)
OF THE STATE OF OKLAHOMA and)
OKLAHOMA SECRETARY OF THE)
ENVIRONMENT C. MILES TOLBERT,)
in his capacity as the)
TRUSTEE FOR NATURAL RESOURCES)
FOR THE STATE OF OKLAHOMA,)

Plaintiff,)

vs.)

4:05-CV-00329-TCK-SAJ

TYSON FOODS, INC., et al,)

Defendants.)

MOTION FOR
PRELIMINARY INJUNCTION HEARING

BEFORE THE HONORABLE GREGORY FRIZZELL

VOLUME VI
Daily Copy Transcript

March 7, 2008

1 Q Good afternoon, Dr. Hennet.

2 A Good afternoon.

3 Q I don't believe we've ever met before, have
4 we?

5 A We have not.

04:00PM

6 Q Preliminarily, Dr. Hennet, I'm going to talk
7 about a few things. You've used principal component
8 analysis before yourself when you've done some
9 environmental source investigations?

10 A Yes, I have.

04:00PM

11 Q So you agree then, sir, that principal
12 component analysis is a valid method to do an
13 environmental investigation of sources?

14 A It's a tool, which help.

15 Q Yes. So it's a valid method?

04:00PM

16 A Sometimes it is perfectly fine.

17 Q Have you published any papers in peer reviewed
18 articles about principal component analysis?

19 A I have not.

20 Q When was the last time you actually performed
21 a principal component analysis similar to Dr.
22 Olsen's analysis?

04:00PM

23 A I've never done something similar to that, but
24 recently I have used a version of principal
25 component analysis to evaluate data. That was about

04:01PM

1 a year ago.

2 Q What site was that?

3 A This site is a site which I believe is a
4 Superfund site, but it's in Union City, Indiana. It
5 was the -- the work was performed -- Union City, you
6 have a stream that passes in the middle of the city,
7 and that stream is contaminated with PCB's. PCB's
8 are polychlorinated biphenyls. It's a group of
9 chemicals.

04:01PM

10 Q Thank you, sir.

04:01PM

11 A You asked me.

12 Q That's as much information as I need. Thank
13 you. In that particular site did you identify a
14 source through principal component analysis?

15 A Actually, principal component analysis was not
16 useful in that case, but it was done nevertheless.

04:01PM

17 Q Okay. So when was the last time you used
18 principal component analysis to identify or help you
19 identify a source of contamination at an
20 environmental site?

04:02PM

21 A Well, you know, the first time I used it as I
22 described --

23 Q The last time, not the first time, the last
24 time.

25 A I thought you asked me when it was useful.

04:02PM

1 Q I asked you the last time you used principal
2 component analysis yourself to identify the source
3 of contamination at an environmental site.

4 A Well, I cannot recall when I would have done
5 that with the exception of the 1981 time frame. I
6 know I have used the tool as a tool like you use
7 many tools because it's not a solution.

04:02PM

8 Q It's been about 25 years that you've used PCA
9 to identify a source?

10 A That's not true. I just mentioned to you last
11 year I did some work with that.

04:02PM

12 Q But you didn't use it to identify a source in
13 that particular instance?

14 A It was done to attempt to identify sources,
15 but it was not successful.

04:02PM

16 Q How many parameters did you use in that last
17 time you attempted to identify a source?

18 A Well, with PCB's when you use this type of
19 tools, you have 290 from PCB --

20 Q So you used all 290?

04:03PM

21 A No, because they were not all there.

22 Q I asked you how many parameters you used when
23 you tried to identified a PCB source a couple of
24 years ago --

25 A Well --

04:03PM

1 common. Those parameters are in the geology, in the
2 soil. They are common, and I think that's quite
3 important.

4 Q It's also very common and associated with
5 poultry litter in a lot higher concentrations than
6 you find with background levels in the IRW; is that
7 correct?

04:40PM

8 A We don't know that really because --

9 Q Didn't you look at the data that Dr. Olsen had
10 in his database concerning reference areas?

04:40PM

11 A I looked at that, yes.

12 Q And there was a substantial difference between
13 the concentrations of these three materials in
14 poultry litter versus background levels in the
15 watershed area; is that correct?

04:40PM

16 A Well, concentration is one thing. Fingerprint
17 is another.

18 Q You can answer the question yes or no.

19 A Concentrations are different depending where
20 you are.

04:41PM

21 Q There was a substantial difference; is that
22 correct, sir?

23 A You have a higher concentration in the chunk
24 of poultry litter than you would have in a Lake
25 Tenkiller sample of water.

04:41PM